

IN THE UNITED STATES DISTRICT COURT OF EASTERN ARKANSAS,

Warren Green

Plaintiff

Vs. case number: 4:14cv649-BSM

North Little Rock School District/ North Little Rock High School

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS  
NOV 05 2014  
JAMES W. MCGHEMACK, CLERK  
By: [Signature]  
Defendant [Signature]  
DJP CLERK  
This case assigned to District Judge Miller  
and to Magistrate Judge Deer

1.

Civil Complaint

Come now Warren Green plaintiff with his pro, se civil complaint against the North Little Rock School District/ North Little Rock High School states: That on or about Oct. 7 2014 plaintiff slip on water failing to the floor while performing work duty at the North Little Rock High School and for this matter the respondent should be held reliable.

2.

Plaintiff states that this Honorable: United States District court do have jurisdiction over the matter.

3.

On or about Oct.7,2014, Plaintiff arrive to work being an employee at the North Little Rock High School , plaintiff enter the school hallway headed to the custodian work supply area an slip and fell cause by water on the floor of the N.L.R High School . Plaintiff received injuries from the fall to a concrete floor, injuries to the neck, left, shoulder, arm, hip, leg and foot, which plaintiff were treated at the Concentra Health Center(AR) at 3470 Lander Road, North Little Rock see attached hereto Concentra Health Center (Medical) Transcription dated Oct. 72014 to be submitted into evidence as exhibit 1. Where plaintiff were positive for headache. See notes, of transcription date 10- 7-2014, Dictated by Susan f. Roy.np. And for this reason respondent should be held reliable, Reason that the unwanted pain were so unbearable , plaintiff return back to the Concentra Health Center (AR) for further medical treatment on Oct. 82014, subjective ; plaintiff activity restriction, no prolonged standing and /or walking longer than

tolerated, no squatting and /or kneeing, should be sitting 75% of the time , no climbing stairs or ladders, which plaintiff custodian work force require as plaintiff duties, plaintiff were treated an founded by medical staff, Dictated by, Brian j. Copt DTP. And for this reason respondent should be held reliable, for plaintiff's unwanted pain and suffering from the injuries cause by the slip and fall which entering the work place. See case Celotex corp. Catrett 106s.ct.2548, 756f.2d181. Also see medical transcription service date Oct. 82014 to be submitted into evidence as exhibit 2. Plaintiff was subscribe, medications, tramadol 50 mg-1po 6 hrs. pm pain #15RO, and need support from a patriot walker part of plaintiff's physical therapy.

Further, plaintiff injuries were so severe cause by the pain DPT Brian j. Cupit functional goals for plaintiff as noted; Gait; initial value, moderate antangic with cane and walking boot; current value plaintiff's unwanted pain were so unbearable , plaintiff could not perform initial value or current value of squatting and bending see, Medical Transcription dated Oct.82014 ,it's a clear fact that plaintiff injuries were cause from the slip and fall while at the work place, and respondent should be held reliable; see Boudreau v. Wal- Mart Stores, Inc. 249,f.3d.715.

### Conclusion

Therefore, plaintiff pray that this Honorable: United States District Court grant Plaintiff Civil Complaint against Respondent and reward Plaintiff Monetary damages in the amount of \$375,000 three-hundred and thirty-five thousand dollars and no cents. Plaintiff's pain and suffering in the amount of \$3.8 million dollars and punitive damages in the amount of 4.1 million dollars and all other relief deem just and proper.

Warren Jackie Huer, Jr.

PLAINTIFF

ADDRESS 220 E 19<sup>th</sup> Street  
N. L. Rock, Ark. 72114  
 PHONE 501- 529- 5203

I, Plaintiff Warren Green hereby have served the Respondent with a complete copy of the foregoing civil complaint, by the United States U.S. Postal Service at the North Little Rock High School at, Address: North Little Rock High School, west. On this 3<sup>rd</sup> day of November 2014.

Warren Jackson Green Sr.

Plaintiff